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7 *Attorney for Defendants*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 JOSEPH WEINFELD, LIANA
11 KNIJNIKOVA, ISAAC WEISS, ROBERT
12 FRANK, YEHUDAH NUSSBAUM, MOSES
13 STEINMETZ, ALBERT ISAAC, JOSEF
14 KOHN, MICHAEL FRIEDMAN, and
15 CONGREGATION BETH JOSEPH,
16 derivatively on behalf of PRECIOUS
17 MINERALS MINING AND REFINING
18 CORP.,

19 Plaintiffs,

20 vs.

21 BILL L. MINOR, JOHN H. REYNOLDS,
22 and WALTER A. MARTING, JR.,

23 Defendants

24 PRECIOUS MINERALS MINING AND
25 REFINING CORP., a Nevada Corporation,

26 Nominal Defendant

3:14-cv-00513-RCJ-WGC

**STIPULATION AND ORDER
TO EXTEND THE DEADLINE
FOR DEFENDANTS TO REPLY
IN SUPPORT OF THEIR
MOTION FOR ATTORNEY'S
FEES AND COSTS**

(Second Request)

27 Plaintiffs JOSEPH WEINFELD, LIANA KNIJNIKOVA, ISAAC WEISS,
28 ROBERT FRANK, YEHUDAH NUSSBAUM, MOSES STEINMETZ, ALBERT
ISAAC, JOSEF KOHN, MICHAEL FRIEDMAN, and CONGREGATION BETH
JOSEPH, derivatively on behalf of PRECIOUS MINERALS MINING AND
REFINING CORP. ("Plaintiffs") and Defendants BILL L. MINOR, JOHN H.
REYNOLDS, and WALTER A. MARTING, JR. ("Defendants"), and pursuant to LR

1 IA 6-1, LR IA 6-2 and LR 7-1, stipulate and agree as follows:

2 On March 27, 2018, this Court entered its Order and Judgment in this case in
3 favor of the Defendants (ECF Nos. 157, 158). On April 10, 2018, Defendants filed
4 their motion for attorney's fees and costs (ECF No. 160), which the Plaintiffs opposed
5 on May 29, 2018 (ECF No. 176) after the parties stipulated to and this court permitted
6 two (2) extensions of time for them to do so (ECF Nos. 173, 175). On June 5, 2018,
7 the date on which the Defendants' reply in support of their motion was initially due,
8 the parties stipulated the an extension of time for the Defendants to reply in support of
9 their motion. The deadline for the Defendants' reply to which the parties agreed by
10 that first stipulation was June 19, 2018.

11 The parties stipulated for an extension of time for the Defendants to file a reply
12 to permit the Defendants' counsel to address irregularities that occurred in the
13 information that was filed by the Defendants at the time they filed their motion for
14 attorney's fees and costs, and to remedy those irregularities in order to meaningfully
15 reply in support of their motion. Defendants' counsel has been delayed in finalizing
16 those efforts due to family illness.

17 By this stipulation, which is the second stipulation for an extension of time for
18 the Defendants to reply in support of their motion for attorney's fees and costs, the
19 parties agree that the Defendants shall have an additional one (1) week to file their
20 reply – to and including Tuesday, June 26, 2018. This stipulation is made by the
21 parties in good faith and not for any improper purpose.

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1 Thus, good cause appearing, the parties agree and stipulate that the current
2 deadline for the Defendants to reply in support of their motion for attorney's fees and
3 costs shall be extended for one (1) week. The Defendant shall have to and including
4 Tuesday, June 26, 2018, to reply in support of their motion for attorney's fees and
5 costs.

6 DATED this 19th day of June, 2018.

7
8 APPEL LAW FIRM PLLC

9
10 /s/ Chaim Z. Appel

11 Chaim Z. Appel, Esq.

12 (pro hac vice)

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17
18 *Counsel for Plaintiffs*

LAW OFFICES OF MICHAEL J. MORRISON

9
10 /s/ Michael J. Morrison

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17
18 *Counsel for Defendants*

19
20 **IT IS SO ORDERED.**

21
22
23  UNITED STATES

JUDGE

24
25 DATED:

26 **June 19, 2018**